

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
FIELDWOOD ENERGY, LLC, <i>et al.</i> ¹	§	CASE NO. 20-33948 (MI)
	§	
Debtors.	§	

AKER SOLUTIONS INC.'S OBJECTION TO CURE
AMOUNT FOR TO BE ASSUMED CONTRACT

Aker Solutions Inc. ("Aker") files this Objection to Cure Amount for to be Assumed Contract, and in support thereof respectfully represents as follows:

1. The Notice of Assumed Contracts and Cure Amounts in the Plan Supplement (Dkt. #1394), the Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts (Dkt. #1395), and the Notice of Filing Amended Schedule of Assumed Contracts and Cure Amounts (Dkt. #1456), each list the Technical Services Contract between Aker and the Debtor Fieldwood Energy LLC as a contract to be assumed and assigned to the Credit Bid Purchaser with a zero dollar cure amount.

2. Aker objects to the proposed zero dollar cure amount. The correct cure amount is approximately \$380,612.20, as more fully described below in the following chart:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

PO Number	PO Date	Scope	Total Amount
69443	4/6/21	FWE Droshky TA2 LOC Troubleshooting & In	\$ 9,800.00
62537	2/24/21	FWE Spares Droshky MCS-Reconciled quote	\$ 163,940.64
50291	12/16/20	Fieldwood-Refurbishment of Droshky MCS	Approx. \$ 100,000.00 ²
49426	12/12/20	FWE Droshky Spare IPCs	\$ 37,821.56
48519	12/8/20	FWE Droshky MCS TA-2/TA-2 Software & Doc	\$ 45,800.00
³		Storage of Customer Owned Property	Approx. \$ 3,000.00
29773	8/17/20	FWE - Thunderhawk MCS Operator's Guide	Approx. \$ 20,000.00 ⁴
TOTALS			\$ 333,532.20

Invoice #	Invoice Date	Amount
917028923	5/11/21	\$ 10,680.00
917028909	5/6/21	\$ 22,700.00
917028911	5/6/21	\$ 10,685.00
917028910	5/6/21	\$ 3,015.00
TOTAL		\$ 47,080.00

3. The correct cure amount (approximately \$380,612.20) must be paid to Aker as part of any assumption and assignment of the Technical Services Contract.

Dated: June 4, 2021
Houston, Texas

/s/ Bruce J. Ruzinsky

Bruce J. Ruzinsky (TX Bar No. 17469425)

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Counsel for Aker Solutions Inc.

² Original purchase order amount was \$60,270.00. However, because of multiple Covid cases and shutting down and reopening the platform, and with the approval of Michael Kinzel at Fieldwood, the amount increased to approximately \$100,000.00. The exact number will be available within the next 10-14 days.

³ A new purchase order is issued each calendar quarter for the storage of Debtor owned property. Aker continues to store Debtor owned property, and the Q-2 purchase order will be issued in July. Each quarterly charge is approximately \$3,000.00.

⁴ Original purchase order amount was \$12,900.00. However, after additional work requested by Michael Kinzel at Fieldwood was performed, the amount increased to approximately \$20,000.00. The exact number will be available within the next 10-14 days.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June 2021, a true and correct copy of the foregoing was served via the Court's CM/ECF electronic notification system for the Southern District of Texas.

/s/ Bruce J. Ruzinsky
Bruce J. Ruzinsky